

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**JOINT MOTION TO DISMISS WITH PREJUDICE**

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move to dismiss with prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41. No other defendants remain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs.

Respectfully submitted,

/s Robert A. Schwartz  
Robert A. Schwartz  
Brent Coon & Associates  
300 Fannin  
Houston, TX 77002  
(713) 225-1682  
bob.schwartz@bcoonlaw.com  
*Counsel for Plaintiffs*

/s/ William M. Gage  
William M. Gage (MS Bar #8691)  
Butler Snow LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4561  
william.gage@butlersnow.com

/s/ Susan M. Robinson  
Susan M. Robinson (W. Va. Bar #5169)  
Thomas Combs & Spann PLLC  
300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 24338  
(304) 414-1800  
srobinson@tcspllc.com  
*Counsel for the Ethicon Defendants*

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

**EXHIBIT A**

<i>Civil Action No.</i>	<i>Case Name</i>
2:14-cv-09957	Crystal Sanchez vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:14-cv-10014	Natalie Rose vs. Ethicon, Inc.; Johnson & Johnson; Ethicon, LLC
2:14-cv-09953	Barbara Mayer v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:14-cv-09967	Belinda Wright vs. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:14-cv-10059	Dorothy Joyce Barton vs. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:14-cv-09926	Eva Bellomo vs. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson